

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

ERIC YOUNG and ADAM KURTZ, on  
behalf of themselves and all others similarly  
situated

Case No. 2:19-cv-01902 (JLR)

Plaintiffs,

v.

IFINEX INC.; BFXNA INC.; BFXWW  
INC.; TETHER HOLDINGS LIMITED;  
TETHER LIMITED; DIGFINEX INC.;  
TETHER OPERATIONS LIMITED;  
TETHER INTERNATIONAL LIMITED;  
AND JOHN DOES 1-50,

Defendants.

**STIPULATION AND [PROPOSED] ORDER**  
**TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(A)**

The Parties, by and through their undersigned counsel, hereby stipulate and agree that this action should be transferred from the United States District Court for the Western District of Washington, Seattle Division, to the United States District Court for the Southern District of New York, New York Division. Defendants shall accept service of process in the Southern District of New York. The Parties also stipulate and agree that this Stipulation and Order, and transfer of the action pursuant to this Stipulation and Order, shall not be deemed to waive any of Defendants' defenses, including but not limited to objections to lack of personal jurisdiction; however, such jurisdictional defenses shall not include any defenses of improper service of process. The parties hereby stipulate to entry of the subjoined order.

1 Dated: New York, NY  
2 December 30, 2019

**WALDEN MACHT & HARAN LLP**

3 By:

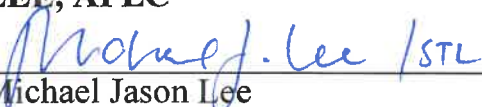
  
Jim Walden  
Daniel A. Cohen  
Stephanie T. Levick  
Walden Macht & Haran LLP  
One Battery Park Plaza, 34th Floor  
New York, NY 10004  
Tel.: (212) 335-2030  
Fax: (212) 335-2040

*Counsel for Defendants iFinex Inc., BFXNA Inc., BFXWW Inc., Tether Holdings Limited, Tether Limited, DigFinex Inc., Tether Operations Limited, Tether International Limited*

12  
13 Dated: San Diego, CA  
14 December 30, 2019

**LAW OFFICES OF MICHAEL JASON LEE, APLC**

15 By:

  
Michael Jason Lee  
Law Offices of Michael Jason Lee, APLC  
4660 La Jolla Village Drive, Suite 100  
San Diego, CA 92122  
Tel.: (858) 550-9984  
Fax: (858) 550-9985

*Counsel for Defendants iFinex Inc., BFXNA Inc., BFXWW Inc., Tether Holdings Limited, Tether Limited, DigFinex Inc., Tether Operations Limited, Tether International Limited*

1 Dated: Carlsbad, CA  
2 December 30, 2019

**DILLON MILLER & AHUJA LLP**

3 By: 

Sunjina K. Ahuja  
Christopher J. Beal  
Dillon Miller & Ahuja LLP  
5872 Owens Ave, Suite 200  
Carlsbad, CA 92008  
Tel.: (858) 587-1800  
Fax: (858) 587-2587

*Counsel for Defendants iFinex Inc., BFXNA Inc., BFXWW Inc., Tether Holdings Limited, Tether Limited, DigFinex Inc., Tether Operations Limited, Tether International Limited*

11  
12 Dated: Seattle, WA  
13 December 30, 2019

**BRESKIN JOHNSON TOWNSEND, PLLC**

14 By: s/ Roger M. Townsend

Roger M. Townsend, WSBA #25525  
Breskin Johnson Townsend, PLLC  
1000 Second Avenue, Suite 3670  
Seattle, WA 98104  
Tel.: (206) 652-8660

*Counsel for Plaintiffs Eric Young and Adam Kurtz and the Proposed Class*

15  
16  
17  
18  
19  
20 Dated: New York, NY  
21 December 30, 2019

**KIRBY McINERNEY LLP**

22 By: 

23 David E. Kovel (*pro hac vice*)  
24 Karen M. Lerner (*pro hac vice*)  
25 Anthony E. Maneiro (*pro hac vice*)  
26 Kirby McInerney LLP  
250 Park Avenue, Suite 820  
New York, NY 10177  
Tel.: (212) 371-6600

*Counsel for Plaintiffs Eric Young and Adam Kurtz and the Proposed Class*

1 Dated: Princeton, NJ  
2 December 30, 2019

**RADICE LAW FIRM, P.C.**

3 By: 

4 John Radice (*pro hac vice forthcoming*)  
5 Radice Law Firm, P.C.  
6 475 Wall Street  
7 Princeton, New Jersey 08540  
8 Tel.: (646) 245-8502

*Counsel for Plaintiffs Eric Young and Adam  
Kurtz and the Proposed Class*

9  
10  
11  
12 **ORDER**

13 Based on the foregoing stipulation of the parties, this action shall be  
14 transferred to the United States District Court for the Southern District of New  
15 York. The clerk is directed to initiate transfer of the action. The within Stipulation  
16 and Order, and transfer of the action pursuant to the within Stipulation and Order  
17 shall not be deemed to waive any of Defendants' defenses, including but not limited  
18 to objections to lack of personal jurisdiction; however, such jurisdictional defenses  
19 shall not include any defenses of improper service of process. No attorneys' fees or  
20 costs shall be awarded in connection with this transfer.

21 Dated this \_\_\_\_ day of December 2019.  
22  
23

24 \_\_\_\_\_  
25 The Honorable James L. Robart  
26  
27  
28